
State of Missouri
Sustainability of the School-to-Work
Opportunities Program

FINAL AUDIT REPORT



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U.S. Department of Education
Office of Inspector General
Kansas City, MO

NOTICE

Statements that management practices need improvement, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determination of corrective action to be taken will be made by appropriate Department of Education officials. This report may be released to members of the press and general public under the Freedom of Information Act.

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EXECUTIVE SUMMARY

The School-to-Work Opportunities Act of 1994 was established to provide seed money to States and local partnerships of business, labor, government, education, and community organizations to develop school-to-work systems. The purpose of these systems is to bring together efforts on education reform, worker preparation, and economic development to prepare youth for high-skill, high-wage careers.

The objective of this audit was to determine whether Missouri has institutionalized elements that are indicative of a sustainable School-to-Work (STW) system. Even though Missouri's five-year STW Implementation Grant had only been awarded one year prior to our review, we found that the State had taken measures that would contribute to system sustainability. Missouri emphasizes career planning and exploration for all students at all grades through its Comprehensive Guidance Program. In addition, the State has enacted the Outstanding Schools Act of 1993, which supports educational reform and workforce development issues.

We also found areas in which actions could be taken to increase the likelihood that Missouri's STW system will be sustained after Federal funding ceases. Therefore, the National School-To-Work Office should work with Missouri STW officials to help them implement the following recommendations.

- The STW Management Team should consider developing State legislation or policy directives to ensure a statewide STW system.
- The STW Management Team should ensure that all functional teams designed to assist in developing the STW system are fully operational.
- The STW Management Team should develop a long-term strategy to identify and commit the resources that will be necessary to sustain STW activities after Federal funding ceases.
- The STW Management Team should develop its own strategic plan to help ensure the sustainability of the STW system and performance indicators to measure the effectiveness of the STW system.
- The STW Management Team should take a larger leadership role in the development of a statewide skill credentialing process.
- The State Board of Education should establish policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students.
- The STW Management Team should intensify efforts to encourage businesses to participate in regional and local partnerships.
- The STW Management Team should continue to develop specific STW programmatic procedures for monitoring, evaluating and providing technical assistance at the regional and local partnerships.

Although the Missouri Department of Elementary and Secondary Education (State) did not fully concur with the findings, they generally concurred with our recommendations. We made changes to the report based on the State of Missouri's response. A synopsis of the State's response is included in the text of this report. The full text of the State of Missouri's response is provided as an attachment to this report. The exhibits to the State of Missouri's response are available in our office and will be provided upon request.

AUDIT RESULTS

The objective of this audit was to determine the degree to which Missouri has institutionalized elements that are indicative of a sustainable STW system. The School-to-Work Opportunities Act of 1994 was established to provide seed money to States and local partnerships of business, labor, government, education, and community organizations to develop STW systems. The purpose of these systems is to bring together efforts on education reform, worker preparation, and economic development to prepare youth for high-skill, high-wage careers. Although Missouri's five-year STW Implementation Grant had only been awarded one year prior to our review, we found that the State had taken measures that would contribute to system sustainability. We also found areas in which actions could be taken to increase the likelihood that Missouri's STW system will be sustained after Federal funding ceases. These areas are summarized below.

SYSTEM STRENGTHS

Legislation/Policy

Missouri's Comprehensive Guidance Program helps to provide career awareness for all students within the State. The Comprehensive Guidance Program is now in its fourteenth year. We were informed that this program has been implemented in approximately 95 percent of the school districts in the State and has been adopted in whole or in part by approximately 30 other States. According to an article in the National Association of Secondary School Principals Bulletin,

"A major aspect of the model is the emphasis on career planning and exploration for all students at all levels, career activities begin in kindergarten. By the time students reach the upper elementary grades, they have [a] foundation [of] knowledge and skills and are ready to begin the process of career education and planning. Guidance programs in the middle level years provide students with expanded and extended career awareness and exploration, using career paths as an organizer for guidance program competencies and activities.... Building on the activities and experiences in elementary and middle schools, comprehensive high school guidance programs assist all students to become responsible adults and effective workers.... Education and career plans developed in the middle level school are reviewed and updated regularly in high school in close collaboration with parents and in accordance with students' post-graduation and career goals. Continued attention is given to assisting students in developing competence in decision making, career planning, working with others, and taking responsibility for their own behavior."

The Outstanding Schools Act of 1993 has been viewed as a plan for educational reform and workforce development. Schools are to be designed to enable students to gain a solid foundation of traditional academic knowledge and skills, and to prepare students for life after school, for higher education, citizenship and productive employment. As provided in the Act, the State Board of Education developed 73 academic performance standards, which establish the knowledge, skills, and competencies needed for students to advance through elementary and secondary education, qualify them for high school graduation, and prepare them for postsecondary education or the workplace or both.

The A+ Schools Program, included in the Outstanding Schools Act of 1993, is designed to improve the educational experiences of students in Missouri's high schools to ensure they graduate, complete a challenging selection of high school studies with identified learning expectations, and proceed to a college or postsecondary vocational or technical school, or a high wage job with work-place skill development opportunities. If a high school satisfies all required A+ elements, qualified graduates will have the opportunity to continue their education at a Missouri community college or vocational technical school free of tuition, fees and the cost of textbooks for two years.

SYSTEM VULNERABILITIES

Legislation/Policy

Missouri does not have specific STW legislation or policies. Missouri proposed a grassroots STW program. The grant proposal states, "The system provides a statewide framework, but depends on community-based grassroots efforts to increase students' awareness of workplace opportunities and training for the skills they will need to successfully pursue their career goals." The approach Missouri has taken is to award grants to regional and local partnerships to implement STW in their respective areas. Officials hope that the success of these partnerships will either encourage others to implement this system or allow the State to set policies in the future.

The 1997 Report to Congress on Implementation of the STW Opportunities Act¹ noted that some States that have made progress towards sustainability have enacted STW legislation and crafted State policies to implement legislation. Our concern with Missouri's approach is that the statewide STW system may take longer than the three years remaining in the grant to become institutionalized. In our opinion, unless there is an increased effort to have all school districts involved with STW, there

¹ This report was prepared by the National School-to-Work Office and forwarded to Congress by Richard W. Riley, Secretary of Education, and Alexis M. Herman, Secretary of Labor. The report was dated September 1997.

will not be a Statewide STW system. The STW Management Team should consider the need for State legislation or policy directives to develop a statewide STW system.

Governance

Missouri's STW Management Team has never been fully staffed. The STW Management Team is to be comprised of five individuals appointed by the directors from the following agencies: Economic Development, Elementary and Secondary Education (DESE), Higher Education, Labor and Industrial Relations, and Social Services. This STW Management Team is responsible for the day-to-day oversight and operations of building and implementing the State STW system. As of July 1998, there were only three members on the STW Management Team: the Assistant Director of School-to-Work Opportunities (within DESE), a staff member from the Department of Economic Development, and a staff member from the Department of Social Services. Also, the grant proposal specified that a member from the Governor's office would serve on the STW Management Team. However, the Governor's office is not represented on that team. In our opinion, as discussed below, to effectively implement an STW system, the STW Management Team needs to have all five members.

Functional Teams designed to assist in developing the STW system are not fully operational. The original grant proposal provided for five multi-functional teams appointed by the STW Management Team to perform specialized functions. Those five teams, along with two additional teams, added later, are the:

- *Technical Assistance Team* to provide technical assistance to regional and local partnerships.
- *Sustainability/Standards Team* to identify potential STW funding sources and suggest methods of using existing funds to meet STW system requirements.
- *Business Contact Team* to work with regional and local partnerships to help them encourage the involvement of local business and industry.
- *All-Students Strategy Team* to identify methods of making STW opportunities available to all students.
- *Evaluation Team* to work with regional and local partnership representatives to design a comprehensive evaluation system.
- *Risk Management Team* to identify key issues relating to safety, child labor laws, liability and insurance, along with production of an information document to give partnerships the guidance they need in these areas.
- *Marketing/Communication Team* to handle all phases of marketing STW.

As of July 1998, only two of the seven multi-functional teams were operational, the Technical Assistance Team and the Risk Management Team. In our opinion, a fully staffed STW Management Team would help to get the multi-functional teams operational. Until the functional teams are operating and carrying out their intended purpose, progress towards implementing a sustainable STW system will be difficult.

Leveraged Funds

Currently, there is no plan to fund the STW system after Federal funding ceases. In our opinion, policy-makers in any State engaged in STW reforms need to plan for the long-term costs of maintaining a STW-based education system. Recent studies indicate that STW-based education systems cost more than traditional education systems. The U.S. Department of Labor's report entitled "Experiences and Lessons of the School-to-Work/Youth Apprenticeship Demonstration," dated 1997, concluded that the cost of STW activities can be substantial. Evidence of the high cost of STW reform is also found in a study published in September 1997 by the Manpower Demonstration Research Corporation—"Home-Grown Progress: The Evolution of Innovative School-to-Work Programs," by Rachel A. Pedraza, Edward Pauly, and Hilary Kopp. This study of 16 projects, similar to STW projects, that had been in existence for an average of seven years found that every one of the projects was staff-intensive and that a full-time or nearly full-time coordinator was critical for program growth. The responsibilities of these non-teaching STW staff were to develop and maintain employer relationships, create work-based learning positions, make efforts to connect school with work, schedule school-based and work-based learning, and monitor student progress at work sites.

As previously stated, a *Sustainability/Standards Team* is planned to identify potential STW funding sources and suggest methods of using existing funds to meet STW system requirements. However, this team is not operational. In order to ensure a sustainable STW system, Missouri needs to develop a long-term strategy to identify and commit the financial resources that will be necessary after Federal funding ceases.

Strategic Planning

A strategic plan with measurable performance indicators would support the development of a sustainable STW system. An independent report titled "Serving the Missouri Workforce, An Inventory of Programs and Policies" (prepared by Jana Zinser, Employment and Job Training Project, National Conference of State Legislatures, dated October 1997) highlights various programs in the area of workforce development and job training, including Federally supported school-to-career systems. The report noted that, although millions are spent on workforce development programs each year, most States do not have a comprehensive system or adequate outcome measures for workforce development. The report recommended that Missouri should consider: (1) developing a statewide strategic plan that includes a coordinated system of services; and (2) developing a

performance management system with State benchmarks, outcomes or performance measures, and accountability.

It is our view also that a comprehensive, strategic plan is needed to develop and sustain statewide systems such as the one envisioned in Federal STW legislation. More specifically, we believe that the STW Management Team should develop a strategic plan for Missouri's STW system. The plan should cover all the components outlined in the Federal legislation, including the identification of resources to sustain the STW system after Federal funding ceases and the development of a State process for skill certification. A State STW official agreed that a strategic plan for STW should be developed. The STW Management Team should also develop performance indicators for measuring:

- o The progress of the Management Team and the State agencies it represents in meeting the strategic goals outlined in the plan, and
- o The progress of the regional and local STW partnerships in meeting their objectives.

Involvement of Stakeholders

State agencies are not providing direction for the development of skill standards and portable credentials. Missouri has not developed statewide skill standards or portable credentials. The STW Management Team has left the development of these credentials up to the local partnerships. State-level coordination of skill certification efforts and the involvement of State agencies in these efforts should be strengthened to ensure the full development and sustainability of a statewide process.

A study conducted by the Manpower Demonstration Research Corporation concludes that occupation-specific skill certification should not be left to "local operators." It notes that State or Federal involvement is needed to ensure the portability of the credentials that are issued. If a skill credential is to be accepted by employers outside a local area, the standards on which the credential is based must be validated by a group that can represent the industry or business on a State, regional, or national level. In addition, a degree of standardization in the assessment instruments and procedures used in the credentialing process is needed to ensure portability.

To ensure the full development and success of Missouri's STW system, we believe that appropriate State agencies should develop or coordinate the development of consistent skill standards. In addition, the State should assess or coordinate the assessment of students' attainment of skills. As of July 1998, none of the 58 local partnerships were developing any type of skill certification.

Missouri has not developed plans to ensure that local school personnel are prepared to deliver STW services to all students in the State. At the time of our field work, State officials had not developed plans to ensure that teachers, counselors, and administrators are prepared to implement a comprehensive STW system. A State official noted that local school districts select the continuing education subjects for their teachers. The State has not provided guidance on STW related training

for teachers, counselors, and other school personnel. In addition, STW is not part of the teacher certification process.

Staff development and certification related to STW activities are important to the success of the STW system. The 1997 Report to Congress on Implementation of the STW Opportunities Act reports, “*States and local partnerships recognize that staff development is an investment that will lead to long-term changes in teaching and developing a future workforce.*” The report also mentions that, “*... pre-service and in-service training and credentialing of teachers, which are considered critical to increasing teacher understanding and practice of STW methodologies, are not yet a major focus.*” In our opinion, Missouri should include STW training in its programs for the development and certification of teachers.

Business involvement is needed for a sustainable statewide STW system. A strong State governance structure that includes ongoing participation by employers is key to maintaining a single, effective system. For this reason, it is important for the *Business Contact* functional team to become fully operational. The STW Management Team should develop a plan to encourage more participation from the business community, including union groups. Once operational the *Business Contact Team* should work with regional and local partnerships to begin efforts to intensify business involvement in implementing a comprehensive STW system statewide.

Roll-Out to Regional and Local Partnerships

Missouri should continue to develop specific STW procedures for monitoring, evaluating and providing technical assistance to regional and local STW partnerships. Currently, Missouri has awarded contracts to 15 regional and 58 local partnerships. As of July 1998, Missouri had entered into a contract with the Division of Job Development and Training to provide monitoring of both regional and local partnerships. Although Missouri has conducted fiscal reviews of the STW partnerships, they have not evaluated the programs progress at either the regional or local partnerships. In our opinion, the STW Management Team should continue to develop specific STW program review procedures that will allow the State to identify weaknesses at the regional and local partnerships that may require technical assistance.

RECOMMENDATIONS

To increase the likelihood that the STW system will be sustained after Federal STW funding ceases, the National School-to-Work Office should work with Missouri STW officials to help them implement the following recommendations.

1. The STW Management Team should consider developing State legislation or policy directives to ensure a statewide STW system.
2. The STW Management Team should ensure that all functional teams designed to assist in developing the STW system are fully operational.
3. The STW Management Team should develop a long-term strategy to identify and commit the resources that will be necessary to sustain STW activities after Federal funding ceases.
4. The STW Management Team should develop its own strategic plan to help ensure the sustainability of the STW system and performance indicators to measure the effectiveness of the STW system.
5. The STW Management Team should take a larger leadership role in the development of a statewide skill credentialing process.
6. The State Board of Education should establish policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students.
7. The STW Management Team should intensify efforts to encourage businesses to participate in regional and local partnerships.
8. The STW Management Team should continue to develop specific STW programmatic procedures for monitoring, evaluating and providing technical assistance at the regional and local partnerships.

Missouri's Comments and Auditor's Response

Although the Missouri Department of Elementary and Secondary Education (State) did not fully concur with our findings, it generally concurred with our recommendations. The State concurred with the finding and recommendation that the STW Management Team develop a strategic plan to help ensure the sustainability of the STW system.

The State disagreed with the finding that it had not considered developing statewide STW legislation or policies. The State noted, *"During the 1999 session of the Missouri General Assembly, legislation was passed, and signed into law by Governor Carnahan to create the "Sponsorship and Mentoring Program". ...this program will foster financial support of mentoring activities, including the principles of STW, by the State's employer base through tax deductions. Employers will be able to contribute funds and receive a state tax deduction up to a maximum of \$2,000 per participating student."* The State believes that the *"Sponsorship and Mentoring Program will result in a large increase in the number of school districts which make STW benefits available to the student/learner population."* The State also noted, *"Further legislative and policy action should be forthcoming during the next few years, despite the barrier of well organized, and influential opposition to STW in Missouri."* In our opinion, the State's new Sponsorship and Mentoring Program is a step towards developing statutory support for STW. We are encouraged by its statement that further legislation and policy action for STW should be forthcoming.

Concerning the recommendation that the Missouri Interagency Team designate the remaining members of the STW Management Team, the State indicated that, *"...since the initial grant implementation date of January 1, 1997, there has been a considerable amount of time when the STW Management Team has not been fully constituted. However, the Management Team is currently fully staffed with representation from each of the five state workforce development agencies as planned, and approved by the U.S. Department of Education..."* The State concurred with the portion of the finding and recommendation that the functional teams designed to assist in developing the STW system were not fully operational. Based on assertions provided by the State, we revised the recommendation.

The State agreed with the recommendation but qualified its concurrence with the finding that they had no plan to fund the STW system after Federal funding ceases. *"The State is addressing alternative funding sources to be made available for STW after the federal grant ends in 2001."* The State noted that three resource areas seem to offer good opportunity for continued funding. They include the new Sponsorship and Mentoring Program; the recent passage of the new Federal vocational education legislation, in response to which the State *"will develop a new vocational education plan which will include the principles of school-to-careers as a key component of the State's plan and therefore benefitting from the resulting funding streams";* and *"...the newly passed Workforce Investment Act [which] may offer funding opportunities for STW to be provided to eligible students and learners."* The State also noted, *"The A+ Schools Program...has already*

awarded \$13.9 million to school districts, and is currently seeking an additional \$1.7 million for State Fiscal Year 2000." We agree that the State has programs that may provide future funding for STW. However this does not represent a formalized long-term strategy to identify and commit the resources necessary to sustain the STW activities. In its response, the State indicated that the Sustainability/Standards Team, which has the responsibility to identify potential STW sources and suggest methods of using existing funds to meet STW system requirements, is currently not operational.

The State did not concur with the "Involvement of Stakeholders" finding and recommendations.

- The State did not concur with the finding and recommendation that agencies are not providing direction for the development of skill standards and portable credentials. *"The State has maintained that system implementation should be locally driven, tailored to meet the needs of the communities and neighborhoods of Missouri, an approach that is consistent with the qualified endorsement of STW by the National Alliance of Business.... While the State has been open in discussion of the benefit which skill credentialing can bring to the student/learner population, the decision whether this is an obligatory option has been left to the partnerships."* The State also referred to a *"well organized, and influential opposition to STW..."* and noted, *"For the State to mandate skill certificates, instead of suggesting their value, would be both extremely inflammatory and detrimental to attempts toward system sustainability."* We disagree with the State's response to skill standards. While opposition to STW in the State may pose a problem, the State should exert more leadership in development of statewide skill standards. There are some widely accepted skill standards (automotive) that can be the basis for legitimizing such standards and developing other industry standards. The State could exert leadership by bringing in regional and local partnerships to statewide meetings to find out about successful skill standards in other states.
- In regards to the recommendation that the State Board of Education should establish policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students, the State responded that this *"is underway through the existing Comprehensive Model Guidance Program administered by the Department of Elementary and Secondary Education."* We agree that the counselors, through the Model Guidance Program are providing STW services to students. However, the amount of services provided by the counselors (500-to-1 student/counselor ratio) may be somewhat limited. As noted in the report, one of the major weaknesses is the lack of involvement by academic educators in the statewide system. In our opinion, by informing and eliciting support for STW from agencies such as school boards, teachers groups, elementary and secondary principals associations, and the local PTAs, the State can involve the local school districts in developing guidance on STW-related training for teachers, counselors, and other school personnel. We believe that STW-related training for staff should lead to long-term changes in teaching which will help improve the future workforce. In addition, including STW methods in teacher training and the credentialing process is critical to increasing teacher understanding and practice of STW.
- Concerning the recommendation to intensify efforts to encourage businesses to participate in regional and local partnerships, the State noted that *"With the designation of a representative to*

the STW Management Team from the Department of Labor and Industrial Relations, the Employer Contact Functional Team is preparing to carry out its charter. Furthermore, Missouri's Community Careers System is currently in the midst of a marketing campaign to garner additional support from the State's employer community. Brochures...seeking employer involvement in the STW initiative have been sent to every employer in Missouri. Respondents will receive additional information from the State, and will receive follow-up contact by the STW coordinator for the regional partnership from the Labor Market Area that the employer is located." We believe that the Employer Contact Functional Team, once fully operational, will help to increase the involvement of employers in Missouri's STW system.

The State agreed with the need for monitoring, evaluation, and technical assistance, but did not concur with the suggestion that no action has occurred. The State indicated, *"From the outset, State plans have called for formal programmatic/systemic, and fiscal monitoring to be carried out by professional monitoring staff from the Department of Economic Development, Division of Job Development and Training."* We recognize that, at the time of our review, the State had entered into a contract with the Division of Job Development and Training to provide the monitoring of the STW partnerships, however, no monitoring reviews had been conducted at that time. As indicated in its response, current monitoring activities have been limited to fiscal reviews, which will be complemented by programmatic/systematic monitoring over the next few months. Once these monitoring and evaluation guides specifically designed for reviewing the STW partnership activities have been developed, the monitoring process will help provide the State with information on how well their partnerships are performing. Based on the information provided by the State, we have revised the report and recommendation accordingly.

Background

School-to-Work is a new approach to learning for all students. It is based on the concept that education works best and is most useful for future careers when students apply what they learn to real life, real work situations. Many young people leave school unequipped with skills they need to perform the jobs of a modern, competitive world economy. In addition, employers are having difficulty finding workers who are adequately prepared for today's more demanding jobs.

The purpose of the School-to-Work Opportunities Act of 1994 (Public Law 103-239) is to provide seed capital to States and localities for developing and implementing comprehensive School-to-Work Opportunities systems that will provide all students with the academic and occupational skills necessary to prepare them for a first job in a high-skill, high-wage career, and to increase their opportunities for further education and training. The Secretary of Labor and the Secretary of Education jointly administer this Act in a flexible manner to promote State and local discretion in establishing and implementing statewide School-to-Work Opportunities systems. The authority provided by the School-to-Work Act will terminate October 1, 2001. Grants are awarded by either the U.S. Department of Education or the U.S. Department of Labor.

The Secretaries of Education and Labor funded activities for the States through Development Grants, to begin creating comprehensive statewide School-to-Work Opportunities systems. These activities must lead to the development of a comprehensive plan for the School-to-Work Opportunities system that addresses the common features, including the basic program components, and leads to the required outcomes described in the purpose of the School-to-Work Opportunities system. The State Implementation Grants enable States to implement their plans for statewide School-to-Work Opportunities systems that will offer young Americans access to programs designed to prepare them for a first job in high-skill, high-wage careers, and for further education and training.

Every State and locally created School-to-Work system must contain the following three core elements:

- School-based Learning - classroom instruction based on high academic and business-defined occupational skill standards;
- Work-based Learning - career exploration, work experience, structured training and mentoring at job sites; and

- Connecting Activities - courses integrating classroom and on-the-job instruction, matching students with participating employers, training of mentors and the building of other bridges between school and work.

While School-to-Work may look different from State to State, it is intended that each local system provides relevant education, marketable skills, and valued credentials to all its learners.

Missouri's STW Implementation Grant from the U.S. Department of Education was approved on December 30, 1996. The grant award is intended to be \$27.6 million for the period 1997 through 2001. In 1997, Missouri was awarded \$4.6 million in the first year of funding and an additional \$23 million spread over the following four years. Missouri had been in the implementation phase of building a School-to-Work system for approximately one year prior to the start of our audit. Before reaching the implementation phase, Missouri received \$580,000 in 1994 and \$386,664 in 1995 in State Development Grant monies. In 1995, Federally Direct Local Partnership Grants totaled \$201,770 and Urban/Rural Opportunity Grants totaled \$1,053,712.

To help coordinate the vast job of School-to-Work system building, Missouri has divided the State into fifteen Regional Partnerships. This network will help the State support the Local Partnerships in their respective geographic areas. Local Partnerships are the core of Missouri's STW system and represent the creative partnerships between education, business and communities that have evolved from individual local situations and environments.

Audit Scope and Methodology

The purpose of our audit was to determine whether Missouri has institutionalized the elements that are indicative of a sustainable School-to-Work system.

In April 1997, officials from the U.S. Department of Education, Office of Inspector General, the U.S. Department of Labor, Office of Inspector General and the National School-To-Work Office (NSTWO) met to formulate an audit strategy that would result in providing added value to NSTWO's current program management strategy. The ability of the STW initiative to continue after the expiration of the STW grants was a major area of concern expressed by NSTWO officials. As a result, officials agreed to the following elements that are considered to be indicative of a sustainable STW system. We believe that the elements listed below are embraced in Section 213 (d) of the Act, which specifies what must be included in a State implementation plan. Elements of a Sustainable School-to-Work System have been identified as:

- (1) Legislation/Policies
- (2) Governance - Organizational Distance from the Governor (subunits-structure, organizational flow, etc.)
- (3) Performance Indicators/Strategic Plans
- (4) Incorporation of Other Programs
- (5) Leveraged Funds
- (6) Involvement of Stakeholders (e.g., students, employers, schools, parents, trade associations, unions, professional associations, K-16 school levels)
 - Incentive/ Reward Structure
 - Certification of Teachers/Guidance Counselors
 - Skill Certificates/Portable Credentials
 - Public Message/Outreach
- (7) System Roll-Out to Regional and Local Partnerships

To accomplish our audit objective we reviewed applicable Federal regulations. We interviewed key personnel and reviewed pertinent documents related to STW at Missouri's State offices. In addition, we reviewed information contained in studies related to STW.

The State of Missouri was selected for an audit of their STW program based on a review done at the National School-to-Work Office in Washington, D.C..

Our audit of the State of Missouri covered the period December 30, 1996, the date the Implementation Grant was awarded, through January 9, 1998. We conducted the fieldwork at the auditee's offices in Jefferson City, Missouri, during the period January 5 through March 19, 1998, as well as in our Kansas City, Missouri, office through July 10, 1998. We also conducted site reviews at two regional and two local partnerships in January 1998. Our audit was conducted in accordance with Government Auditing Standards appropriate to the scope of review described above.

EXHIBIT: State of Missouri's Response
(The exhibits to the State of Missouri's response are
available in our office and will be provided upon request.)

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